

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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JOSE ACEVEDO, Etc.,

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Case No. 23-cv-0489-bhl

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-VS-

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MICHAEL A MATTIOLI, et al.

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JOINT MOTION TO AMEND SCHEDULING ORDER

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NOW come the parties and respectfully request this Honorable Court amend the current scheduling order to enlarge the deadlines outlined herein.

The parties have engaged in paper discovery which is still ongoing. Plaintiff propounded initial Interrogatories, Requests to Produce, and Requests to Admit on March 4, 2024. Defendant Mattioli provided responses on April 8, 2024. The remaining Defendants have responded to Plaintiff's Requests to Admit on April 16, 2024, and unsigned responses to Interrogatories on April 26, 2024. The city defendants have collected, reviewed, redacted and bates-stamped approximately 400 pages of additional materials, in addition to approximately 700 pages previously provided as Initial Disclosures. Counsel has indicated these materials will be produced, at latest, by the end of this week.

Further, counsel for the Defendants have several upcoming trials which pose a significant scheduling conflict for essential depositions in this complex wrongful death case against the City

of Milwaukee and officer(s) currently employed and formerly employed by the City of Milwaukee.

Attorney Williams will be on a 4 day trial in the Eastern District of Wisconsin the week of May 6, 2024 in the case *John Burks v. City of Milwaukee, et al.*, Case No. 2020-cv-0782; Attorney Williams has an oral argument scheduled with the Seventh Circuit on May 23, 2024 in the case of *Isaiah Taylor v. City of Milwaukee, et al.*, Appeal No. 23-3151; and Attorney Muche will be on trial in *Ricardo Menol-Mejia v. City of Milwaukee*, in Milwaukee County Circuit Court (Case No. 2020-cv-5027) the week May 20, 2024. This trial is expected to last 3 days, at minimum, and requires an interpreter.

Counsel for the parties recently conferred and respectfully submit the following proposal to the Scheduling Order:

	<u>Proposed (New)</u>	<u>Current</u>
Fact Discovery	December 1, 2024	August 16, 2024
Primary Expert Witness Disclosures	August 15, 2024; Rebuttal October 1, 2024	May 1, 2024; Rebuttal June 16, 2024
Expert Discovery	December 1, 2024	August 16, 2024
<i>Daubert</i> Motions	March 15, 2025	November 30, 2024
MSJ	January 10, 2025	September 20, 2024

Based upon the foregoing, the parties respectfully request this Honorable Court approve the proposed (new) deadlines outlined above.

Dated this 30th day of April 2024.

Respectfully submitted,

*s/ B'Ivory LaMarr*

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